

Exhibit A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

This Document Relates to:

ALL ACTIONS

**[PROPOSED] ORDER TO SHOW CAUSE
WHY PLAINTIFFS IN EXHIBIT A1 WHO
HAVE SUBMITTED NON-BONA FIDE RIDE
RECEIPTS SHOULD NOT BE DISMISSED
WITH PREJUDICE**

Having considered Uber's Motion for Entry of an Order to Show Cause Why 7 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with Prejudice, the Court hereby GRANTS the motion.

The Court’s Pretrial Order No. #5 required Plaintiffs to provide “a bona fide ride receipt from an Uber trip connected to the alleged incident[.]” ECF 175, ¶ 4.

The 7 Plaintiffs listed in Exhibit A1 of the Motion have submitted non-bona fide receipts.

The Ninth Circuit has recognized that dismissal of claims is warranted under Federal Rule of Civil Procedure 37 where a party “willfully, deliberately, and intentionally submitted false documents to support apparently untenable claims and defenses.” *Pro. Seminar Consultants, Inc. v. Sino Am. Tech. Exch. Council, Inc.*, 727 F.2d 1470, 1472, 1474 (9th Cir. 1984). Courts may also impose sanctions as part of their “inherent power to control their dockets,” including their “inherent power to dismiss an action when a party has willfully deceived the court[.]” *Thompson v. Hous. Auth. of City of Los Angeles*, 782 F.2d 829, 831 (9th Cir. 1986); *Wyle v. R.J. Reynolds Indus., Inc.*, 709 F.2d 585, 589 (9th Cir. 1983).

Accordingly, the 7 Plaintiffs listed in Exhibit A1 are hereby ORDERED TO SHOW CAUSE why their claims should not be dismissed with prejudice. The Plaintiffs shall file a written response no later than [____]. The response must specifically address the factual and legal basis for the submission of the non-bona fide receipts and why the conduct does not warrant dismissal under the Court's inherent powers.

[PROPOSED] ORDER TO SHOW CAUSE WHY PLAINTIFFS WHO HAVE SUBMITTED NON-BONA FIDE RECEIPTS SHOULD NOT BE DISMISSED WITH PREJUDICE

1 The Court orders Plaintiffs with MDL IDS 3621 and 3962 to submit within 30 days to a deposition
2 not to exceed 3 hours regarding how the Plaintiffs became involved in the litigation, how the fraudulent
3 receipt was generated and distributed, and who else was involved in or aware of the fraud at issue here.

4

5 **IT IS SO ORDERED.**

6

7 Dated: _____, 2025

8 _____
9 HON. CHARLES R. BREYER
10 United States District Court Judge

EXHIBIT A1

MDL ID	Law Firm
3666	Pulaski Law Firm, PLLC
3699	Pulaski Law Firm, PLLC
3787	Pulaski Law Firm, PLLC
3877	Reich and Binstock, LLP
3921	Peiffer Wolf Carr Kane Conway & Wise
3962	Reich and Binstock, LLP
3977	Reich and Binstock, LLP